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2 **IN THE UNITED STATES DISTRICT COURT**
3 **FOR THE DISTRICT OF MARYLAND**

4 MARYLAND SHALL ISSUE, INC., *et al.*,)
5)
6 *Plaintiffs,*)
7)
8 v.) Case No. 8:21-cv-01736-TDC (L)
9) Case No. 8:22-cv-01967-DLB
10 MONTGOMERY COUNTY, MD.,)
11)
12 *Defendant.*)

13 **DECLARATION OF JOHN DOE NO.2**

14 COMES NOW, the declarant, JOHN DOE NO.2, and hereby solemnly declares
15 under penalties of perjury and states that, based upon personal knowledge, the contents of the
16 following declaration are true:

17 1. My name is [JOHN DOE NO.2]; my true identity is being withheld for fear of
18 being stigmatized or retaliated against, either professionally or personally, both of which are
19 unfortunately becoming more prevalent in the current cultural and political climate. I am
20 concerned that should my name become a matter of public record or even unintentionally leaked
21 to the public, my professional reputation and ability to earn a livelihood to support my family could
22 be negatively affected. I am also concerned for the social effects on my children should my name
23 be publicly associated with an issue that many people do not fully appreciate and with regard to
24 which many people are intolerant and would not hesitate to demonize me and my children. I am
25 a member of Maryland Shall Issue, Inc., a plaintiff in the above-captioned matter. I am an adult
26 over the age of 18, a resident of Montgomery County, Maryland and I am fully competent to give
27 sworn testimony in this matter.

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EXHIBIT Q

1 2. In addition to being a resident of Montgomery County, I have been a Maryland
2 Wear and Carry Permit holder for nearly five years. I have over twenty-five years of experience
3 and training in self-defense and have completed countless hours of firearms safety and skill
4 training, with instruction from military, law enforcement and civilian instructors. I currently serve
5 as the chair of my synagogue's security committee and volunteer as a member of our synagogue's
6 small and discrete armed security team at the request of our Rabbi. As the grandchild of four
7 Holocaust survivors, I had a conversation with my synagogue Rabbi in 2016 wherein I voiced
8 concerns regarding the alarming rise in attacks against synagogues, Jewish institutions, and Jewish
9 individuals. The Rabbi shared my concerns and agreed that our small synagogue needed a small
10 group of well-trained, responsible, armed congregants willing and able to defend the synagogue's
11 congregants, until police arrived, in case of emergency (including in the event of an attack on the
12 synagogue by individuals with weapons). It was for this reason that I initially obtained my Wear
13 and Carry Permit at the request of my synagogue's Rabbi, and as an identifiably Jewish individual,
14 this continues to be one of the main reasons that I have legally carried a firearm for the past five
15 years.

19 3. Over the last few years, there has been a marked increase in the frequency of
20 attacks against synagogues, Jewish institutions and Jewish individuals worldwide, nationally and
21 on the East Coast (Pittsburgh, New York, Florida and right here in Montgomery County). Most
22 recently, antisemitic and vandalistic threats were made against the Montgomery County Jewish
23 community - in the past 2 weeks, there have been at least two incidents of antisemitic graffiti (one
24 at the Bethesda Trolley Trail, which including the words, "no mercy for Jews" and murderous
25 depictions of lynchings or hangings and another with swastikas near the intersection of Old
26 Georgetown Road and Tuckerman Lane) and prior to that there was an incident in August 2022,
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1 which included swastikas and white power symbols. There have even been incidents over the past
2 few months (which have been reported to the county police department) of members of our
3 synagogue and other synagogues nearby being accosted, taunted and even threatened while
4 walking to synagogue. There is also an individual who lives within walking distance of our
5 synagogue and at least two other synagogues, a Jewish daycare facility a Jewish school (and
6 various other places of worship and schools) who has a military background, but appears to suffer
7 from mental illness and regularly wears a T-shirt depicting a swastika and who has verbally
8 accosted members of the Jewish community. The police have stated that his speech is
9 constitutionally protected and there's nothing they can do unless and until he breaks a law or harms
10 a member of the community. His antagonism towards the local Jewish community combined with
11 his mental illness and his military training creates a potentially volatile and dangerous situation for
12 the members of the local Jewish community, the nearby houses of worship and Jewish institutions
13 and the visibly Jewish children in our neighborhood. Should this individual suffer some sort of
14 "psychological break" or psychological episode, it will likely not matter to him that he is within
15 100 yards of a "place of public assembly" as defined in the Montgomery County Code and
16 prohibiting law-abiding citizens from having the means to protect themselves and their loved ones,
17 will likely only increase the harm inflicted in any potentially violent attack by this individual on
18 what he now knows to be an unarmed and unprotected community. Montgomery County Bill 21-
19 22E disarms the Jewish community and other communities of faith, hamstrings our ability to
20 protect ourselves and our loved ones and makes us and our institutions softer and more vulnerable
21 targets for anyone wishing to attack Jews and cause death and suffering to an already vulnerable
22 community and who, by dint of the fact that he or she wishes to illegally harm others, quite
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1 obviously does not care about any legal restrictions imposed by law on the law-abiding citizens of
2 our county or the State of Maryland.

3 4. Our synagogue is a small Jewish congregation that cannot afford to hire armed
4 security or off-duty police officers at every service (3 times per day, 365 days per year).
5 Additionally, as a member who attends services regularly, I am in many ways better-suited to
6 notice things that are out of the ordinary or individuals who are potential threats than the random
7 employee of a security guard company or a random police officer. In today's climate of increased
8 antisemitism and violence against synagogues and other Jewish institutions as well as other
9 communities of faith, it is imperative that members of all faiths be able to feel safe and secure in
10 their houses of worship and have the means to protect themselves with any lifesaving means if
11 threatened by violent criminals who, in any case, ignore the laws and do not apply for Maryland
12 Wear and Carry permits prior to committing crimes.

13 5. In this time of rising crime rates and increased threat against the Jewish
14 community, prohibiting members of the Jewish community (and other faith communities) from
15 carrying firearms for self-defense and personal protection (a) makes our institutions more
16 vulnerable to attack by those evil individuals and groups who wish to do us harm and have no
17 regard for the laws in any event and (b) forces individuals to choose between (i) their desire to be
18 safe and secure in their places of worship, (ii) their desire to be law-abiding citizens, and (iii) their
19 desire to freely and openly practice their religious faith, protected by the First and Fourteenth
20 Amendments of the Constitution of the United States, as well as the Declaration of Rights of the
21 Constitution of Maryland.

22 6. As a visible and identifiable Jewish individual, I regularly and legally carry a
23 loaded firearm nearly everywhere I go, which includes parks, the private Jewish day school that
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my children attend, libraries, recreational facilities, healthcare facilities, and childcare facilities. Furthermore, because my home is located within 100 yards of a house of worship, under Montgomery County Bill 21-22E, I am prohibited from leaving my house with a firearm (including in my own yard). Additionally, the roads in my neighborhood and those on which I commute daily are lined by houses of worship, schools, parks, healthcare facilities, recreational facilities, long-term facilities and childcare facilities, as such Montgomery County Bill 21-22E, prohibits me from leaving my home with my firearm.

7. I hereby declare that the factual allegations in the complaint that relate or refer to myself and MARYLAND SHALL ISSUE, INC., are true.

/s/ John Doe No.2

Dated this day of November 30, 2022:
JOHN DOE NO.2